

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
Competitive Bidding Procedures for)	AU Docket No. 12-25
Mobility Fund Phase I Auction 901)	
)	
Universal Service Reform Mobility Fund)	WT Docket No. 10-208

To: The Commission

COMMENTS OF TEXAS RSA 7B3, LP D/B/A PEOPLES WIRELESS

Texas RSA 7B3, LP d/b/a Peoples Wireless (“Peoples Wireless”), by its attorneys, hereby submits comments on the potential eligibility of certain census blocks for Mobility Fund Phase I support. Specifically, Peoples Wireless will demonstrate that a significant number of census blocks in Wood County, Texas and Upshur County, Texas¹ identified by the Federal Communications Commission (“FCC” or “Commission”) in its *Public Notice* released February 10, 2012² as being unserved by 3G or better service are in fact served by Peoples Wireless and therefore should be removed from the list of census blocks included in the forthcoming Auction 901.

In calculating which census blocks within Wood and Upshur Counties are served by 3G or better mobile wireless service, the Commission relies upon coverage propagation maps generated by individual mobile service providers which were then aggregated by Mosaik Solutions f/k/a American Roamer (“Mosaik”). The Commission’s most recent interactive map suggests that there are 80 unserved census blocks in Wood County and 69 unserved census blocks in Upshur County. However, the maps created by Mosaik and relied upon by the

¹ Wood County and Upshur County are both located in CMA 658 (TX-7).

² “Mobility Fund Phase I Auction, Updated List of Potentially Eligible Census Blocks”, Public Notice, DA 12-187 (released February 10, 2012) (“*Public Notice*”).

Commission do not incorporate coverage propagation maps furnished by Peoples Wireless, a provider of mobile wireless broadband service in Wood, Upshur and other counties in northeast Texas. Peoples Wireless has built a 4G wireless network that provides service to 33 of the 80 census blocks in Wood County and 5 of the 69 census blocks in Upshur County provided by the Commission.³ Attachment A depicts Peoples Wireless' current 4G coverage propagation map which is set against a map of the unserved census blocks in both Wood and Upshur Counties. The combined maps clearly depict the 4G wireless services provided by Peoples Wireless in a total of 38 unserved census blocks. Attachment B lists these same 38 census blocks. For all of these reasons, the 38 census blocks originally deemed "unserved" by the Commission should instead be redesignated as "served" and accordingly removed from inclusion in Auction 901. The Commission's decision to award \$300 million in Mobility Fund Phase I support to rural markets is fully supported by Peoples Wireless. However, these scarce funds should be targeted towards other rural markets in the United States clearly lacking the prospects for 3G or higher services.

Respectfully submitted,

TEXAS RSA 7B3, LP D/B/A PEOPLES WIRELESS

By: */s/ Caressa D. Bennet*

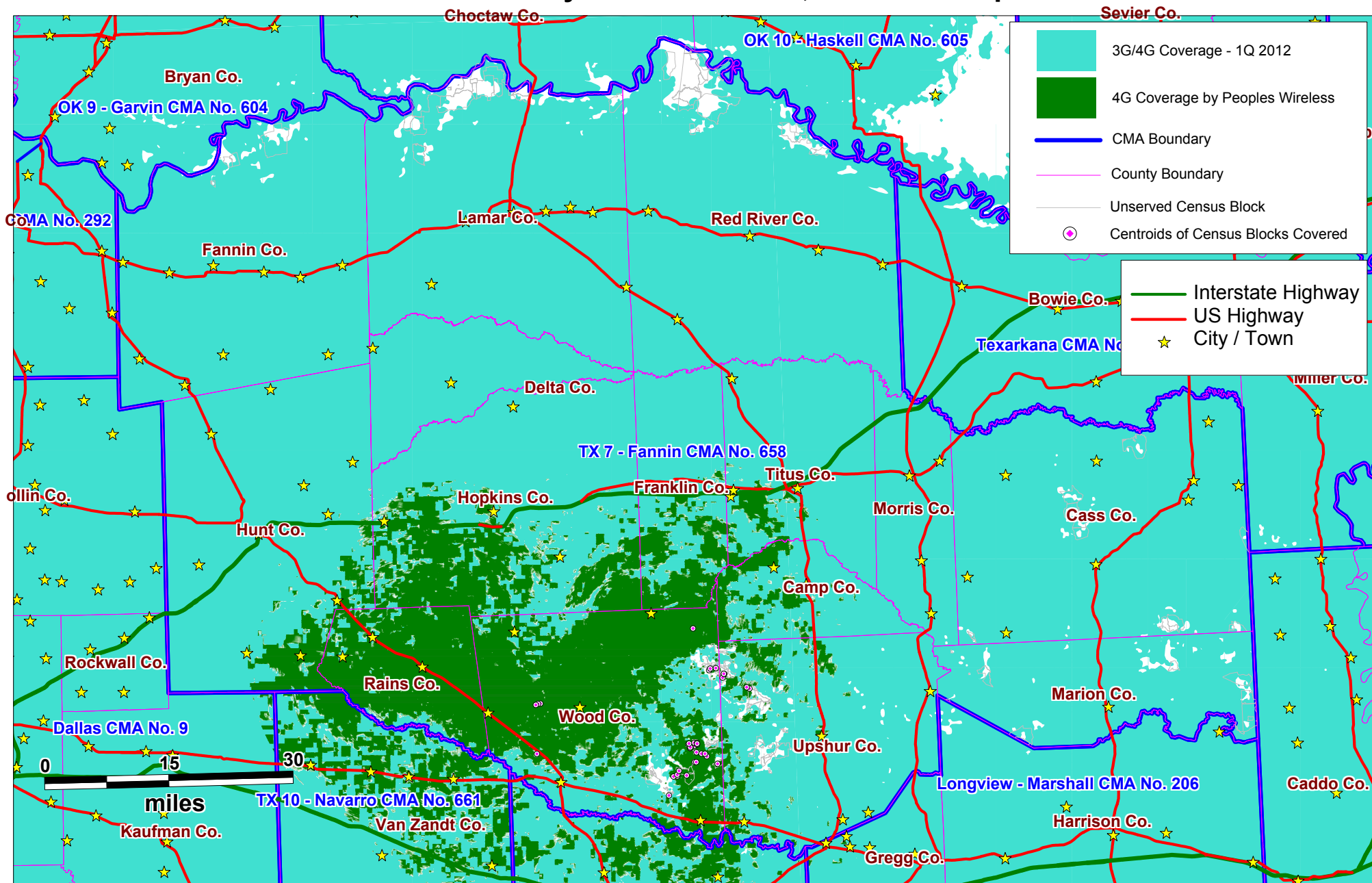
Caressa D. Bennet
Daryl A. Zakov
Bennet & Bennet, PLLC
4350 East West Highway, Suite 201
Bethesda, MD 20814
(202) 371-1500

Its Attorneys

March 16, 2012

³ On March 16, 2012, Peoples Wireless reported its 4G coverage to Mosaik so that Mosaik could include this information going forward. Prior to this time, Peoples Wireless had not reported its improved coverage data to Mosaik nor had it used Mosaik's mapping services.

Attachment A: Unserved Census Blocks in CMA658 (TX-7 Fannin) Served with 4G by Texas RSA 7B3, LP d/b/a Peoples Wireless



March 16, 2012


Attachment B: List of Served Census Blocks to be Removed from Auction 901

Census Block	State	County	CMA	Census Tract	Census Block Group
484599502003074	TX	Upshur	658	48459950200	484599502003
484599502003086	TX	Upshur	658	48459950200	484599502003
484599502003087	TX	Upshur	658	48459950200	484599502003
484599502003088	TX	Upshur	658	48459950200	484599502003
484599502003102	TX	Upshur	658	48459950200	484599502003
484999501001031	TX	Wood	658	48499950100	484999501001
484999501002045	TX	Wood	658	48499950100	484999501002
484999501002052	TX	Wood	658	48499950100	484999501002
484999501002138	TX	Wood	658	48499950100	484999501002
484999503022163	TX	Wood	658	48499950302	484999503022
484999503022164	TX	Wood	658	48499950302	484999503022
484999503022173	TX	Wood	658	48499950302	484999503022
484999506012101	TX	Wood	658	48499950601	484999506012
484999506012104	TX	Wood	658	48499950601	484999506012
484999506012111	TX	Wood	658	48499950601	484999506012
484999506012158	TX	Wood	658	48499950601	484999506012
484999506021077	TX	Wood	658	48499950602	484999506021
484999506021078	TX	Wood	658	48499950602	484999506021
484999506021080	TX	Wood	658	48499950602	484999506021
484999506021084	TX	Wood	658	48499950602	484999506021
484999506021086	TX	Wood	658	48499950602	484999506021
484999506021087	TX	Wood	658	48499950602	484999506021
484999506021089	TX	Wood	658	48499950602	484999506021
484999506021091	TX	Wood	658	48499950602	484999506021
484999506021102	TX	Wood	658	48499950602	484999506021
484999506021120	TX	Wood	658	48499950602	484999506021
484999506021121	TX	Wood	658	48499950602	484999506021
484999506021123	TX	Wood	658	48499950602	484999506021
484999506021133	TX	Wood	658	48499950602	484999506021
484999506022030	TX	Wood	658	48499950602	484999506022
484999506022040	TX	Wood	658	48499950602	484999506022
484999506022051	TX	Wood	658	48499950602	484999506022
484999506022052	TX	Wood	658	48499950602	484999506022
484999506022057	TX	Wood	658	48499950602	484999506022
484999506022136	TX	Wood	658	48499950602	484999506022
484999506022143	TX	Wood	658	48499950602	484999506022
484999506022150	TX	Wood	658	48499950602	484999506022
484999507002061	TX	Wood	658	48499950700	484999507002


DECLARATION OF STEVEN STEELE

I, Steven Steele, do hereby declare under penalty of perjury under the laws of the United States of America, the following:

1. I am the General Manager of Peoples Wireless and an authorized officer of Texas RSA 7B3, LP d/b/a Peoples Wireless.
2. I have read the foregoing Comments. I have personal knowledge of the facts and representations set forth herein with regards to the services offered by Peoples Wireless, and believe them to be true and accurate.



Steven Steele



Date